

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

GINA LEE TALLEY

CHAPTER 13

DEBTOR

CASE NO. 18-11359 JDW

**MOTION FOR MODIFICATION OF AUTOMATIC
STAY TO ALLOW LOAN MODIFICATION AGREEMENT**

COMES NOW, Gina Lee Talley, by and through her attorney, and moves the Court for entry of an Order Allowing a Permanent Loan Modification Agreement with Fay Servicing. A copy of the Trial Loan Modification Agreement is attached hereto as “**Exhibit A**”. Upon entry of the order pursuant to this Motion and execution of the Loan Modification Agreement, the Agreement shall become binding upon all parties thereto, the proposed order is attached hereto.

WHEREFORE, Debtor prays that the order be entered modifying the automatic stay to allow a Permanent Loan Modification Agreement upon submission of the order to the Court.

Respectfully submitted, this the 7th day of June, 2021.

/s/ Robert H. Lomenick

KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
SCHNELLER & LOMENICK, P.A.
126 North Spring Street
Post Office Box 417
Holly Springs, MS 38635
Phone: (662)252-3224/karen.schneller@gmail.com
robert@northmsbankruptcy.com

CERTIFICATE OF SERVICE

I, Robert H. Lomenick, attorney for the Debtor, hereby certify that a copy of the foregoing Motion for Modification of Automatic Stay to Allow Permanent Loan Renewal Agreement has this day been served upon the following, either by electronic means or by United States Mail.

Fay Servicing, LLC
Attn: Bankruptcy Department
P.O. Box 814609
Dallas, TX 75381-4609

Caliber Home Loans
Attn: Loss Mitigation Modification
12801 Wireless Way
Oklahoma City, OK 73134

Caliber Home Loans
PO Box 24610
Oklahoma City, OK 73124-0610

Laura Henderson-Courtney, Via ECF
on behalf of U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust
laura@kmcpail.law, lhend@aol.com

J. Gary Massey, Via ECF
on behalf of U.S. Bank Trust, N.A., as Trustee for LSF9 Master Participation Trust
msbankruptcy@logs.com

Locke Barkley
Chapter 13 Trustee
6360 I-55 North, Suite 140
Jackson, Mississippi 39211

Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201

This the 7th day of June, 2021

/s/Robert H. Lomenick
ROBERT H. LOMENICK